

## Letter For Electronic Distribution

Original signed letter on file at the following address:

Nevada Division of Environmental Protection,  
Bureau of Federal Facilities  
333 W. Nye Lane  
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April 12, 2000

Mr. John Dirickson, P.E.  
Environmental Engineer  
Naval Air Station, Fallon  
Public Works Department  
Environmental Division-Code 187JD  
4755 Pasture Rd.  
Fallon, NV 89496

RE: Draft Final Decision Documents for Sites 7, 9, 10, 11, 12, 17, 18, 19, 23, and 24; August 27, 1999  
Comments Common to all Sites  
Remedial Investigation/Feasibility Study  
Naval Air Station Fallon

Dear Mr. Dirickson:

Nevada Division of Environmental Protection (NDEP) staff has reviewed NAS Fallon's Report entitled *Decision Document, Sites 4, 7, 9, 10, 11, 12, 17, 18, 19, 23, and 24, Draft Final*, dated August 27, 1999. This report was prepared in response to a series of NDEP letters which commented on NAS Fallon's report entitled *Record of Decision, Sites 4, 5, 7, 8, 9, 10, 11, 15, 17, 18, 19, 23, 24, 25, 26, 27 Naval Air Station Fallon* (ROD), dated June 5, 1998. Due to significant changes between the Draft Final Decision Document and the Record of Decision, the referenced Draft Final Decision Document was reviewed as a draft document instead of a draft final.

The NDEP submitted site-specific comments for Sites 7, 9, 10, 11, 12, 17, 18, 19, 23, and 24 in previous letters. NDEP comments which are applicable for all of these sites, but were not presented in the previous letters, are attached to this letter. NAS Fallon needs to address these comments in conjunction with the site-specific comments submitted in the other letters.

If you have any questions, or need further clarification, please do not hesitate to contact me at (775) 687-4670, extension 3053.

Sincerely,

Jeffrey J. Johnson, P.E.  
Geological Engineer  
Bureau of Federal Facilities

JJJ/js  
cc list on page 2

cc:

Douglas Bonham, NAS Fallon

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**COMMENTS ON THE DRAFT FINAL DECISION DOCUMENT  
SITES 7, 9, 10, 11, 12, 17, 18, 19, 23 AND 24**

1. General: Throughout the course of the RI/FS process, NAS Fallon has made reference to poor water quality in the upper aquifer underlying the base. This issue was not formally addressed in the Draft Final Decision Documents. If NAS Fallon desires to seek an exemption from corrective action requirements for a site due to high total dissolved solids (TDS), in accordance with NAC 445A.22725 (2)(b), then a formal request must be made. TDS concentrations in the upper aquifer vary considerably. Based on available information, TDS concentrations appear to be below 10,000 mg/L in many areas at NAS Fallon. To demonstrate that TDS concentrations are higher than 10,000 mg/L, isocon maps need to be prepared. Regardless of the TDS concentration, an exemption from corrective action cannot be authorized for groundwater that discharges into drainage canals which flow into several lakes and wetlands in the area
2. Page 1, first paragraph: Some of the Draft Final Decision Documents state “*This Decision Document provides a formal record for the remediation for Site .....* ”.

The sites discussed in the Draft Final Decision Documents were investigated, not remediated. The above statement needs to be revised accordingly.

3. Page 1, last paragraph in Section I: The Draft Final Decision Document states: “*There are not any nationally significant or precedent setting issues for this site.*”

Before the NDEP can sign a “No Further Action” Decision Document, the above statement needs to be changed to state that concurrence with “No Further Action” is based on achieving the cleanup goals which are the ARARs. ARARs include State Action Levels and Federal Maximum Contaminant Limits (MCLs), Preliminary Remedial Goals (PRGs), and Toxicity Characteristic Leaching Procedure (TCLP) levels. Also, as stated on page 1-18 of the RI Report, the action level for total petroleum hydrocarbons (TPH) in ground water is 1 mg/L when ground water discharges to surface water.

4. Section 1.2 Geology: The Draft Final Decision Documents states “*The soils beneath NAS Fallon are primarily fine grain (clay, silt & silty clay) with small amounts of coarser grain material (sand, silty sand & sandy silt). Soil permeability is generally in the range of  $10^{-4}$  to  $10^{-2}$  centimeters/second (cm/s); however, local areas of coarser grained or clayey soil may display higher or lower permeability than this range.*” The PA/SI Report prepared by Dames & Moore, and dated April 1988, was referenced.

The first sentence stated above appears to be inconsistent with the PA/SI Report prepared by Dames & Moore. The Dames & Moore Report states on page 4-24:

*“Shallow lake deposits are present at ground surface throughout much of NAS Fallon. These deposits consist mainly of clay and silt in the southeast corner of NAS Fallon, and of mainly sands elsewhere on the base..... Eolian sand deposits are found in the northwest corner of NAS Fallon... Most of the Quaternary sedimentary fill in the Carson Desert was transported into the valley by the ancestral Carson River. Coarse-grained alluvial deposits form stringers which trend roughly northwesterly across NAS Fallon... These were laid down in ancient distributary channels of the Carson River. Fine-grained alluvium, mostly silts, were deposited in areas between the channels”*

The above description of geologic conditions at NAS Fallon indicates that contaminants in groundwater at NAS Fallon may be transported at higher velocities than indicated by the geologic description in the

Draft Final Decision Document. This information needs to be included in the Decision Document. If the interpretation of lithologic conditions changed based on data collected during the RI/FS, then supporting documentation must be provided.

5. Section 1.4: The Draft Final Decision Document states “*A spill could occur during a rare rainstorm or human induced runoff and be sufficient to carry contaminant or contaminated soils directly into the irrigation or drainage canals.*”

Spills frequently occur at NAS Fallon during normal base operations. The above statement needs to be revised to state that a spill could occur **during normal base operations** and be sufficient to carry contaminants or contaminated soils directly into the irrigation or drainage canals.

6. The Draft Final Decision Document also states in Section 1.4: “*Because of low precipitation and high evaporation rate, small releases can not reach the water table*”.

Many of the releases at NAS Fallon are due to leaking underground pipelines and storage tanks. Therefore, the above statement should state “..... *small releases **at the ground surface may not reach the water table***”.

7. Section D, National Priorities List (NPL) Status: The Draft Final Decision Document states “*The U.S. Environmental Protection Agency (U.S. EPA) has reached a decision of no further action under CERCLA and removed NAS Fallon from its listing. NAS Fallon Sites are Non National Priorities List (Non-NPL) sites.*”

If this section remains in the Decision Document, it needs to clarify that regardless of U.S. EPA’s decision on no further action under CERCLA and deletion of NAS Fallon from the NPL list, investigations and remedial actions are still required under the IR Program and State regulations. The 1997 Navy/Marine Corps IR Manual states on page 6 “*All sites, whether on the NPL or not, require notification, public participation, and implementation of state and Federally defined ARARs.*” The manual also states that the Navy/Marine Corps IR Program includes the cleanup of spills of petroleum, oil, or lubricants as well as hazardous wastes. Petroleum hydrocarbons are not included in the CERCLA process, but are required to be investigated and remediated under State regulations. Therefore, the CERCLA process alone does not completely guide the process of investigating and remediating contaminated sites at NAS Fallon.

8. Section F: The Draft Final Decision Document states “*An initial TRC scoping meeting was held at NAS Fallon in June 1989 to discuss potential requirements for the future PA/SI or remedial investigations and feasibility studies (RI/FS) activities at NAS Fallon.*”

The PA/SI Report was completed in April 1988. The above statement is inconsistent in regards to the “future PA/SI” and needs to be corrected.

9. Section F and Appendix C: Section F for each Draft Final Decision Document and Appendix C state the administrative record is complete and available for review at the Churchill County Library. The NDEP contacted the Churchill County Library during October 1998 regarding the administrative record. Based on information provided to the NDEP, the administrative record is not complete. Please ensure that all documents referenced in the Decision Document are located at the library for the public to review.
10. The Decision Document needs to present the ARARs (MCLs, TCLPs, PRGs, or State action levels) for

contaminants associated with each site. Contaminant concentrations must be compared to the ARARs and quantification limits to justify that “No Further Action” is appropriate. PRGs would apply for those contaminants that have no established TCLP level or MCL. Semi-volatile organic compounds (SVOCs) were analyzed in groundwater samples for some sites. The quantification limit for analysis of SVOCs in groundwater was reported in the Draft Final Decision Documents as 10 ug/l. These quantification limits are higher than MCLs or PRGs which have been established for several compounds that could be present in groundwater. This information must be clearly presented in the Decision Documents.

11. Appendix C, Section 6 comments: NAS Fallon comments presented in Appendix C for each site state “*Reference to public hearing dates, public comments and responses to comments are included in the Draft Final Decision Document.*”

The Draft Final Decision Documents have not yet been subjected to the public review process. Therefore, the above statement is inappropriate. If facts presented in the Final Decision Documents differ significantly from those presented in the Draft Final Decision Documents which were submitted for public review, then a new public reviewing may be required.